

EXHIBIT B

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[Proposed] Lead Counsel for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

GGCC, LLC, Individually and on Behalf of All
Others Similarly Situated,

Plaintiff,

vs.

DYNAMIC LEDGER SOLUTIONS, INC., et
al.,

Defendants.

Case No. 3:17-cv-06779-RS

CLASS ACTION

JOINT DECLARATION IN SUPPORT OF
LEAD PLAINTIFF MOTION

1 We, David Lang, Ryan Coffey, and Alejandro Gaviria, pursuant to 28 U.S.C. §1746, declare
2 as follows:

3 1. We respectfully submit this Declaration in support of our Motion for appointment as
4 lead plaintiff pursuant to the Private Securities Litigation Reform Act of 1995 (“PSLRA”), and for
5 approval of our selection of Robbins Geller Rudman & Dowd LLP and Silver Miller as lead counsel.
6 We each have personal knowledge about the information in this Joint Declaration relating to our own
7 activities, actions and beliefs.

8 2. I, David Lang, am an educator at a community college. As reflected in my
9 certification, I invested a significant amount of Bitcoin in the Tezos initial coin offering and have
10 suffered substantial harm as a result of the alleged violations of the federal securities laws in this
11 action.

12 3. I, Ryan Coffey, work in financial services for a national bank. As reflected in my
13 certification, I invested a significant amount of Bitcoin in the Tezos initial coin offering and have
14 suffered substantial harm as a result of the alleged violations of the federal securities laws in this
15 action.

16 4. I, Alejandro Gaviria, work in compliance for an international banking corporation.
17 As reflected in my certification, I invested a significant amount of Ether in the Tezos initial coin
18 offering and have suffered substantial harm as a result of the alleged violations of the federal
19 securities laws in this action.

20 5. We understand that, if appointed as lead plaintiff, we will be entrusted with
21 prosecuting this action on behalf of not only our interests, but the many other investors whose
22 interests are at stake. We are aware that, as lead plaintiff, we will interact with and direct counsel,
23 review and comment on important pleadings and documents in the case, attend certain court
24 hearings, participate in discovery (including having our depositions taken and providing evidence
25 relating to our investments in the Tezos initial coin offering), participate in settlement discussions,
26 attend trial, if necessary, and authorize any potential settlement on behalf of the class as well as
27 approve any attorneys’ fee and cost request by counsel. As our certifications attest, we are willing to
28 undertake these responsibilities.

1 6. Before filing our lead plaintiff motion, we decided to seek appointment as lead
2 plaintiff together in part because we transmitted both Bitcoin and Ether in the Tezos initial coin
3 offering and our active involvement in the case will ensure the putative class is broadly represented.
4 We also believe our collective resources, investment experience, and diversity will benefit the class
5 in prosecuting this litigation.

6 7. We have established communication channels so we can efficiently communicate
7 with each other and with our counsel regarding the litigation. As we already have been, we will
8 continue to be apprised of significant litigation developments and have established with our
9 proposed lead counsel that counsel will only act pursuant to lead plaintiff's direction and oversight.
10 We will continue to communicate with each other to efficiently oversee and direct the litigation.
11 Together, we will make decisions on behalf of the class whenever necessary.

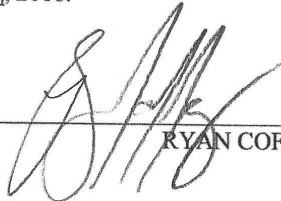
12 8. We understand that, as lead plaintiff, it is our responsibility to select counsel for the
13 class. We have selected Robbins Geller Rudman & Dowd LLP and Silver Miller as Lead Counsel.
14 Our decision is based on the fact that Robbins Geller has a successful track record in prosecuting
15 securities class action cases and has an office in San Francisco where this case is pending and Silver
16 Miller has experience prosecuting class actions and in cryptocurrency. We have confirmed that
17 neither firm will duplicate effort or costs and that the firms have agreed to a clear, written agreement
18 regarding work in the case. We will approve any fee/expense request before it is submitted to the
19 Court.

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1 I, David Lang, declare under penalty of perjury that the foregoing is true and correct to the
2 best of my knowledge. Executed on January 24, 2018.

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5 
6 DAVID LANG

7 I, Ryan Coffey, declare under penalty of perjury that the foregoing is true and correct to the
8 best of my knowledge. Executed on January 24, 2018.

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11 
12 RYAN COFFEY

13 I, Alejandro Gaviria, declare under penalty of perjury that the foregoing is true and correct to
14 the best of my knowledge. Executed on January 24, 2018.

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18 ALEJANDRO GAVIRIA